

**United States Bankruptcy Court
Middle District of Pennsylvania**

In re:

Blake L. Mackesy,

Debtor.

Case No. 5:22-bk-00340-MJC

Chapter 13

Objection to ECF No. 66

Debtor's Objection to Motion for Relief from the Automatic Stay

Debtor Blake L. Mackesy, by her attorney, hereby objects to the Motion for Relief from the Automatic Stay filed by Movant Rushmore Loan Management Services, LLC as servicer for U.S. Bank National Association, not in its individual capacity but solely as trustee for RMTP Trust, Series 2021 Cottage-TT-V. The Court must deny the Motion for the following reasons:

1. The purported arrearage is inconsequential.
2. The Movant is adequately protected because the secured collateral's value exceeds the value of the Movant's claim.
3. The Debtor can satisfy the purported arrearage by making curative payments to the Movant through the plan.
4. The Debtor can satisfy the purported arrearage by making curative payments directly to the Movant in a timely manner.

The Debtors respectfully request that the Court grant relief in the form of order attached and further in her favor, if necessary and proper under the law.

Date: April 23, 2024

CIBIK LAW, P.C.

Attorney for Debtor

By: 

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Certificate of Service

I certify that on this date I caused this document to be served on all parties on the Clerk's Service List by electronic means through the CM/ECF system.

Date: April 23, 2024



Michael I. Assad

**United States Bankruptcy Court
Middle District of Pennsylvania**

In re:

Blake L. Mackesy,

Debtor.

Case No. 5:22-bk-00340-MJC

Chapter 13

Related to ECF No. 66

Order Denying Motion for Relief from the Automatic Stay

The Court having considered the Motion for Relief from the Automatic Stay (ECF No. 66) filed by Rushmore Loan Management Services, LLC as servicer for U.S. Bank National Association, not in its individual capacity but solely as trustee for RMTP Trust, Series 2021 Cottage-TT-V, and after notice and opportunity for hearing, it is hereby **ORDERED** that:

1. The motion is **DENIED**.